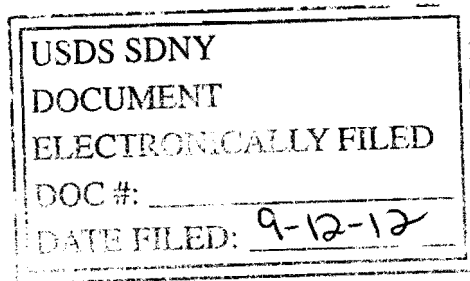


MEMO ENDORSED

August 31, 2012

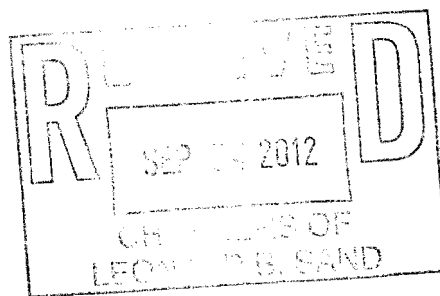


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**VIA HAND DELIVERY**

Honorable Leonard B. Sand  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007-1312



Re: Zhang, et. al. v. Baidu.com Inc. and People's Republic of China, Case No. 1:11-cv-03388 (LBS)

Dear Judge Sand:

We write as counsel to Defendant Baidu.com Inc. ("Baidu"), for whom we have today filed a notice of limited appearance for the purpose of contesting service of process in the above-referenced action. Plaintiffs filed a Motion for Default Judgment on July 23, 2012 ("Motion for Default Judgment"), for which the Court's docket indicates a return date of Tuesday, September 4, 2012.

Plaintiffs' Motion for Default Judgment is predicated on purported service of process on our client in the People's Republic of China. We contest the validity and sufficiency of Plaintiffs' purported service.

Baidu respectfully requests an extension of the return date on Plaintiffs' Motion for Default until Thursday, October 4, 2012, at 2:15 p.m., and a corresponding extension of Baidu's time to serve answering papers until Monday, October 1, 2012, at 12 noon. This is Baidu's first request for adjournment or extension.

I spoke to Plaintiffs' counsel by telephone yesterday, prior to being authorized by Baidu to make a limited appearance, to inform Plaintiffs' counsel that we might be seeking an adjournment of the return date on Plaintiff's motion. Plaintiffs' counsel requested that I call him back after we had been authorized to appear and indicated that he would be available today to discuss this. I attempted unsuccessfully to reach Plaintiffs' counsel by phone this morning. In view of the impending return date and the intervening holiday weekend, I then called Your Honor's Chambers and was advised to make this request by letter and serve a copy on Plaintiff's counsel, which we have done by hand.

Sincerely,



Carey R. Ramos

CR:REE

cc: Stephen N. Preziosi, Esq. (by hand)

MEMO ENDORSED

*Extension granted  
as requested.  
So ordered  
[Signature] USMJ  
9/12/21*